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To: <bbrattain@waterboards.ca.gov>
Date: 04/07/2006 4:06:43 PM
Subject: Comments on Draft General WDRs - Green Waste Composting

Hello Bill - Thanks for the opportunity to comment on the 1st Draft.
Please add me to the mailing list as an interested party.

General WDRs
Page 10, B. Discharge Specifications

Items 1 & 2 - What about existing pads at existing facilities? There should be some provision for existing controls, as long as they meet your specifications and/or the approval of RWQCB staff.

Page 14, E. Provisions

Item 5 - Why does the Design Report/CQA for a runoff retention/washwater basin need to be signed and stamped by a PE or CEG? I would think that if the proposed controls meet your specs/requirements in the General WDRs, then the report should only need to be signed by the property owner. Or, if you are wanting oversight by someone who understands environmental management, perhaps open up the signatory requirements to include Registered Environmental Assessors (REAs - registered with Cal-EPA), or other similar professional designations. I say this, because I know many PE/CEGs who would have no idea of how to design a retention pond. Opening up the signatory requirements also reduces cost burden on the GW compost businesses in your jurisdiction, and would increase the rate of compliance.

Monitoring and Reporting Program
Page 2, C. Reporting

2nd Paragraph - Same comment as Item 5 above. As a Calif. REA with over 20 years of experience in all facets of EH&S, I have prepared hundreds of SWPPPs and Annual Reports. I've yet to encounter a technical report that I cannot interpret and convey to a client or a regulatory agency. Again, limiting who can prepare & sign the reports puts constraints on compliance (and generated an unfair business advantage to PE/CEGs).

3rd Paragraph, Semi-Annual Report, Item (g) - Max. Volume Present - Do you mean Total for the 6 months, or the Max. volume at any given time? (I assume the latter).

Information Sheet
Page 2, Discharge Analysis Table

Is this Table for illustration purposes only? What is the purpose of including the Water Quality Objective? Are these your intended Limits for stormwater run-off, and if so, will the dischargers be fined or penalized if their results exceed these objectives?

That's all I have. Looks like a pretty straight-forward reg. that will help streamline and standardize the WDR compliance process.

Thanks and Best Regards,

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